

STATE OF SOUTH CAROLINA

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State Budget and Control Board
DIVISION OF INFORMATION RESOURCE MANAGEMENT

FEDERAL COMMUNICATIONS COMMISSION
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COMPTROLLER GENERAL

1201 MAIN STREET, SUITE 930
COLUMBIA, SOUTH CAROLINA 29201
(803) 737-0077

TED L. LIGHTLE
DIVISION DIRECTOR

JOHN DRUMMOND
CHAIRMAN, SENATE FINANCE COMMITTEE

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CHAIRMAN, WAYS AND MEANS COMMITTEE

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May 28, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C.

RE: PR Docket No. 92-235
"Refarming" the Spectrum Below 512 MHz

Dear Ms. Searcy:

The Division of Information Resource Management of the State of South Carolina Budget and Control Board (DIRM) hereby submits its comments on the proposals before the Commission to "refarm" the electromagnetic spectrum allocated to the private land mobile radio services in the frequency bands below 512 MHz.

The DIRM is the state governmental entity charged with centralized procurement and management responsibilities respecting the telecommunications and information processing resources of the South Carolina State Government and a large number of its agencies, including those engaged in the daily protection of life and property within the State. As such, the DIRM is an interested party in this proceeding which will, in a very substantial way, redefine the spectral boundaries and reshape the electromagnetic environment within which the agencies whose communications needs the DIRM oversees operate.

The DIRM commends the Commission's effort and enthusiastically supports its goal to promote efficient use of the precious publicly-owned resource allocated for use by the private land mobile community. Our specific concerns regarding the manner in which the Commission has proposed to achieve that goal are set forth below. In general they relate to implementation costs and interoperability of equipment, and to proposed changes in technical parameters affecting reliability and system coverage.

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The State of South Carolina presently has 18 mutual aid channels (9 pairs) in the frequency bands below 512 MHz. These channels have proven to be critical in many situations where public safety operations involve communications between law enforcement officers, fire fighters and other public safety personnel. The continued availability of these channels under new rules adopted in this proceeding is vitally important in order to preserve inter-agency radio communications capabilities, the lack of which will result in life threatening situations for the public safety personnel involved.

The current communications infrastructure managed by the DIRM on behalf of South Carolina State agencies consists of 109 coordinated radio systems including in excess of 9000 units. These 9000 units operate within the spectrum below 512 MHz and include base station, mobile radio and portable radio equipment. Absent a gradual migration path which would allow agencies sufficient time to fully amortize existing equipment, the cost of replacing that infrastructure would approximate \$46,000,000. In addition to the direct cost to the State, an equal or greater cost would be burdened upon the State's forty-six counties and one-hundred plus municipalities. These entities are the primary providers of Public Safety, Emergency Medical, and Fire Services within their geographic areas of responsibility. With the addition of administrative radio system requirements to the emergency services infrastructure component the impact to the total state could well exceed \$100,000,000. We are concerned that the proposed rules fail to provide for the necessary gradual migration and that agencies and municipalities will therefore be forced into a wholesale change-out of equipment, placing demands on state and local budgets that may unnecessarily cripple both public safety and other important services.

Additional costs will emanate as well from the proposed reduction in base station transmitter power and the resultant reduction in coverage. The effect of this proposed rule will be to force the affected agencies to purchase additional equipment, towers, antennas, etc. in order to reinstate the original coverage or restore the reliability of the former system or to replace equipment that cannot operate at the lower power levels. Clearly, where critical law enforcement or emergency medical operations are underway, system reliability is crucial and must be preserved at any cost. Finally, we are concerned that the need to preserve interoperability between old and new systems, between urban and rural areas, and between federal and state agencies will force agencies to invest in multiple radios at yet further expense. It is absolutely imperative that the rules adopted in this proceeding take these matters into account, recognizing the protracted timetables which typically affect appropriations and procurement practices by government agencies.

While we are concerned with some of the means by which the Commission has proposed to achieve the goal of improved spectral efficiency, we support the work of APCO Project 25 and are convinced that it will achieve the Commission's objectives without creating unacceptable operational dislocations and economic burdens. We support the positions put forth by APCO in

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its comments in this proceeding and request that the Commission carefully consider them and those discussed here as it undertakes its restructuring of the rules governing private radio operations in the bands below 512 MHz.

Respectfully submitted,



Ted L. Lightle
Director

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